

1 they compiled and sent to me for me to look over and approve.
2 But I don't have a recollection of this. This is 1988 and I
3 get reports all the time. I have similar reports, but this
4 does not really impress me as being anything that I really
5 focused on that much. I, I, I don't know what this is or if I
6 asked for it.

7 JUDGE CHACHKIN: Well, it says on the front page
8 what it is. It tells you what it provides you, a listing of
9 all the TBN stations, authorizations. Isn't that what it
10 says?

11 MRS. DUFF: I --

12 JUDGE CHACHKIN: Full-power and low-power.

13 MRS. DUFF: I just don't remember focusing on this
14 in, in 1988.

15 JUDGE CHACHKIN: Do you know whose handwriting it is
16 on page 12?

17 MRS. DUFF: No, sir.

18 JUDGE CHACHKIN: You don't recognize the
19 handwriting?

20 MRS. DUFF: You mean the, the, the numbers?

21 JUDGE CHACHKIN: Yes.

22 MRS. DUFF: No, sir.

23 JUDGE CHACHKIN: It's not yours?

24 MRS. DUFF: No, it's not.

25 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

1 MR. SCHONMAN: Thank you, Your Honor.

2 BY MR. SCHONMAN:

3 Q Mrs. Duff, we can move on to Bureau Exhibit
4 Number 95.

5 MR. COHEN: One ninety-five?

6 MR. SCHONMAN: I'm sorry. Thank you, Mr. Cohen,
7 195.

8 BY MR. SCHONMAN:

9 Q And that's an invoice from the law firm of May and
10 Dunne. This one is dated May 10, 1988. It's directed to
11 Trinity Broadcasting Network and includes charges for services
12 rendered to NMTV. And my question is why is NMTV included in
13 this bill?

14 A I don't have any further to add to this question.

15 JUDGE CHACHKIN: One further question with respect
16 to 194. When you received this document, I recognize today
17 you don't remember about it, but you did receive this
18 document, did you not?

19 MRS. DUFF: More than likely I did.

20 JUDGE CHACHKIN: Did you complain to May and Dunne
21 about the fact that NMTV stations were commingled with the
22 other stations and put on a listing of TBN stations?

23 MRS. DUFF: I would not have been happy with that.

24 JUDGE CHACHKIN: Did you complain to May and Dunne
25 about that?

1 MRS. DUFF: Sir, I, I don't really remember at, at
2 this point. I, I just --

3 JUDGE CHACHKIN: When you say you don't remember, do
4 you remember -- do you have a specific recollection of having
5 made any complaint to May and Dunne?

6 MRS. DUFF: I don't even remember the document.

7 JUDGE CHACHKIN: All right. Please continue.

8 BY MR. SCHONMAN:

9 Q Mrs. Duff, we can move on to Bureau Exhibit
10 Number 196. Can you explain to me what this is?

11 A This looks like the final shipment of the equipment,
12 the transmitter antennae and feedline, for Midland-Odessa.

13 Q And it's on a Trinity form?

14 A Yes.

15 Q And it requisitioned again by Ben Miller?

16 A Yes.

17 Q Ben Miller did a lot of work for the Odessa station,
18 didn't he?

19 A He was -- I relied upon him to, to do the
20 engineering, yes.

21 Q He did a lot of work for NMTV with respect to the
22 Odessa, with respect to the Odessa station?

23 A I would rather say that, you know, as an engineer I,
24 I don't think he did any more than what would be normal for
25 consulting with the station manager who was really involved

1 with the building of the station. Ben's role would be a
2 consulting role. He would have assisted the engineer if he
3 had any problems, but basically Ben was helping to order the
4 equipment. That doesn't mean he was actually their affiliate.
5 We had an engineer there with an assistant that was actually
6 building the station.

7 Ben was responsible for ordering the equipment and
8 making sure that the station manager had help if he needed it.

9 Q Wasn't he actually supervising the construction of
10 this station?

11 A He -- I don't -- He may have been in a supervisory
12 role as far as making sure that the equipment was ordered, but
13 he wasn't necessarily somebody that was -- He was never on the
14 site. That's what I'm trying to get at. He was never on the
15 site. Everything he did was on the telephone.

16 Q What is Mr. Miller's title at TBN?

17 A Today, he's vice president of TBN Engineering.

18 Q And in May 1988, do you recall what his position was
19 with TBN?

20 A He wasn't vice president at that time, I don't
21 believe. He would have been probably network chief engineer.

22 Q That's a salaried position?

23 A Yes.

24 JUDGE CHACHKIN: We do have the testimony of
25 Mr. Miller in deposition form which has been accepted by

1 stipulation.

2 BY MR. SCHONMAN:

3 Q To your knowledge, did, did the salary that
4 Mr. Miller received from TBN, was that salary affected in any
5 way by the services that he performed for NMTV?

6 A No, sir.

7 Q A moment ago you testified that Ben Miller never
8 visited the Odessa site. Is that your testimony?

9 A Not to my knowledge. I don't believe he ever
10 visited the Odessa site.

11 Q Mrs. Duff, we can move on to Bureau Exhibit
12 Number 197. That's a special meeting of Trinity Christian
13 Center of Santa Anna, Inc., dated June 3, 1988. Now, Trinity
14 Christian Center of Santa Anna is TBN, isn't it?

15 A That's correct.

16 Q It had changed its name?

17 A Yes.

18 Q Okay. So this is -- For the sake of clarity, this
19 is a board meeting of TBN's board?

20 A Yes.

21 Q Were you at this meeting?

22 A Yes, sir.

23 Q Why were you at this meeting?

24 A At Mr. Crouch's request.

25 Q Do you know who prepared this -- the minutes of this

1 special meeting?

2 A They look like Mr. Juggert's minutes.

3 Q Now, I notice that the, the very first paragraph on
4 page 1, it identifies the directors who were present but it
5 doesn't identify in that paragraph any other individuals who
6 were in attendance at that meeting. But, of course, we know
7 you were there because, number one, you've testified that you
8 were there, and also, there's a reference that you discussed
9 Channel 63 in Monroe, Georgia.

10 A Yes.

11 Q Do you know why Mr. Juggert did not identify you as
12 being present at the meeting in the first paragraph where he
13 identifies who was present?

14 A I don't know.

15 Q Mrs. Duff, we can turn to Bureau Exhibit Number 199.
16 That's another invoice from May and Dunne directed to Trinity
17 Broadcasting Network and includes charges for services
18 rendered to NMTV, and the date of this bill is June 15, 1988.
19 Do you know why NMTV is included in this bill?

20 A I don't have anything additional to add to that.

21 Q Bureau Exhibit Number 200, now, this is a grant to
22 NMTV of its application for a low-power station on Channel 56
23 in Fresno, correct?

24 A Yes.

25 Q And that was granted June 23, 1988?

1 A Yes.

2 Q Now, unlike the Houston low-power grant, this grant
3 was made to NMTV. If you recall, the Houston grant was made
4 to Translator TV, Inc., correct?

5 A Yes.

6 Q Do you know why this grant was made to NMTV?

7 A Well, at this time, we had made the name change.

8 Q Mrs. Duff, after NMTV received this grant, did they
9 proceed to build the station?

10 A Yes, sir.

11 Q How soon after the grant -- Strike that. How soon
12 after NMTV received this grant did it commence constructing
13 the low-power station at Fresno?

14 A I'd have to go back through the record to know the
15 exact time frame. I, I don't remember exactly.

16 Q Was it very soon afterwards?

17 A The only reason why we wouldn't build the station
18 right away is if we had some problem with the site or
19 something of that nature, something beyond our control,
20 because we were very good at building stations as quickly as
21 we could.

22 Q Mrs. Duff, would you turn to Bureau Exhibit
23 Number 226, please? That's an office memo from George
24 Sebastian to Paul Crouch.

25 A Oh, 226?

1 Q Yes.

2 A Oh, I'm sorry.

3 Q Do you have that before you?

4 A Yes.

5 Q Does this help you establish when NMTV commenced
6 measures to place the Fresno station on the air?

7 A Yes.

8 Q How soon after NMTV received the Fresno grant did it
9 commence construction of the Fresno station?

10 A How soon after did we -- actually got the grant, how
11 soon did we commence construction?

12 Q Yes. And when I say commence, I mean took any
13 measure at all towards placing this station on the air.

14 A Oh, we would -- The first thing that we do is to --
15 As soon as we get a grant, we verify that our site is still
16 there, so I called and talked to the site owner to make sure
17 everything was still okay and he said no problem. And at that
18 time, we weren't doing site surveys prior to the time we build
19 the station, but we order -- First thing we do is to order the
20 equipment, and it takes about 90 days for them to fabricate
21 the equipment.

22 And from that point, 'cause -- Let's see, when did
23 we get the grant? What was that date in the exhibit? I'm not
24 good at remembering numbers.

25 Q Number 200. And that grant was June 23, 1988, of

1 the Fresno low power.

2 A And this was -- There's a date here that says
3 11/17/88. Well, that's when we popped up there on the air.

4 Q I'm sorry, I didn't get that.

5 A I think that's pretty good, to get a station on that
6 fast, '88, the same year. It takes 90 days at least to get
7 the equipment, and then for them to deliver the equipment and,
8 you know, to schedule the crew in and, and all that. I think
9 that's an excellent record, knowing what we have to go through
10 with some of the stations.

11 Q So in a little under five months from receiving the
12 grant you had a station up and running?

13 A I tell you, I think we need to be commended for
14 that. After the FCC keeps us waiting how many years?

15 Q Well -- Well, let's go back to the Houston low-power
16 station. What did you do when you received that grant?

17 A That particular grant was years and years and years
18 and years coming. And once we got it, we were in the midst of
19 trying to build two full-power stations, and I was just
20 inundated with all my responsibilities for, you know, with
21 these two stations trying to get on the air. And besides
22 that, the, the Houston station was only 100-watter and I knew
23 that it was, it was just -- I was on overload.

24 Q I see.

25 A And I just felt like hey, I called David and he

1 concurred with me and we decided that we'd just go ahead and
2 sell it, although Mr. Crouch wanted to have it built, even if
3 we -- And that way he could have his telethon on without
4 having to, to worry about -- You know, with the educational
5 station in Houston, TBN's telethons don't run. And this would
6 be a way that he could run a TBN telethon in Houston. But I
7 was just on overload and David agreed with me. He says go
8 ahead and sell it, and I had somebody that called me and asked
9 me if I would sell it and I said yes. And so we sold it for
10 our expenses.

11 Q Thank you, Mrs. Duff. Let me -- In all fairness,
12 let me try to put this in a -- in context. The Houston low-
13 power permit was granted in January of 1988. At that time,
14 NMTV didn't have the Portland station. And a moment ago you
15 testified that you were very busy trying to get the Portland
16 and the Odessa stations on the air.

17 A Well, I'm sorry. I was negotiating in the Portland
18 issue. The Portland station took a lot of negotiation because
19 we had that problem with the site and Channel 49. And so I
20 think within that time frame I was very much involved with
21 Portland. If it wasn't actual construction, it was some stage
22 of the negotiation. And, of course, with Odessa, that was the
23 first full-power station that I had full responsibility for
24 seeing -- the oversight of seeing that that station was going
25 to get on the air.

1 That was a very heavy responsibility. I had never
2 done anything like that before.

3 Q Now, despite the amount of overload that you've
4 described in terms of the amount of work you had, within five
5 months NMTV got the, the Fresno station up and running.

6 A There's no comparison between getting a low-power
7 station up and running and a full-power station, I assure you.
8 My responsibilities were nothing like what it required for a
9 full-power station. A low-power station, basically all you
10 have to do is to have a contractor to, to order the equipment.
11 There can be problems, but it's, it's no comparison to a full-
12 power station, believe me.

13 Q But the Houston station was a low-power station.

14 A It's work, but there's no comparison to a full-
15 power. That's all I'm saying. We're talking about apples and
16 oranges.

17 Q Maybe I'm not getting my point across. If I
18 understand your testimony correctly, the reason that NMTV did
19 not construct the Houston station is because you just had too
20 much work to do. You were working on other things. Yet,
21 you've just explained why NMTV was able to build the Fresno
22 station, because it's essentially relatively easy to do so.
23 Now, how does that square with NMTV's decision not to build
24 the Houston station? If it was so easy to build the low-power
25 station, why didn't NMTV construct that station?

1 A All right. Fresno was probably the easiest
2 construction that we had of any low-power station we've ever
3 built because, obviously, five months, there were no problems
4 with the site. The site was still available and it was an
5 easy build. I knew with Houston being a -- The site was not
6 -- If my memory serves me correctly, I think there was a
7 problem with the site. We would have had to get a different
8 site, which meant modification, more money, more time
9 involved. It's, it's a headache when you have to go about
10 modifying the station, and everything was not going to be
11 smooth with that one.

12 Q Now, in January 1988 when NMTV received the Houston
13 low-power grant, TBN already had a station, a full-power
14 station, up and running. That is, on the air in Houston,
15 correct?

16 A That's correct.

17 Q Isn't that the reason that NMTV decided not to
18 construct the low-power Houston station, because it would have
19 been a waste of time to do so given the fact that there was a
20 full-power station already on the air programming TBN
21 broadcasts?

22 A As I explained before, maybe I didn't make it clear,
23 Mr. Crouch wanted to have the low-power station there so that
24 he can have a TBN telethon in Houston. The full-power station
25 is an educational channel which can only raise funds for the

1 local -- It can't raise funds for anything but its own
2 station. Mr. Crouch's idea was to have the network program --
3 the network telethon which he could raise funds for anything
4 he wanted to.

5 But in Houston, he's limited to raising funds for
6 the specific educational stations. So it would have been a
7 real boon to him, to the network, to have an outlet for the
8 TBN network telethon. That could mean hundreds of thousands
9 of dollars. In retrospect, I think about it, he probably was
10 pretty upset with, with me when I decided that I didn't have
11 time to, to fool with building that station because that meant
12 that TBN really did suffer a loss of dollars, and I don't
13 particularly want to bring that subject up.

14 Q Now, the Houston low-power station was just a 100-
15 watt station, as you've said.

16 A It was a 100 watts.

17 Q What type of reach would 100-watt low-power station
18 have? How would that have helped with the gross receipts of
19 TBN?

20 A You'd be amazed at -- Strategically located, a 100-
21 watt station would probably get -- In an area like Houston,
22 it's flat, there's no obstructions, and with the proper site
23 we could probably get quite a few miles. And it's a densely
24 populated community, so I think his calculations were pretty
25 good, that we could have -- TBN could have raised a

1 substantial amount of money on that station.

2 Q Mrs. Duff, let's turn now to Bureau Exhibit
3 Number 201. Now, despite the fact that you were very busy
4 during this period of time, this is an application for a new
5 low-power television station to serve Salt Lake City, Utah,
6 and that was filed June 24, 1988. Do you have that before
7 you?

8 A Yes.

9 Q And if you turn to page 14 of that application, it
10 shows that NMTV was intending to file more low-power
11 applications during this very busy period, applications for
12 Hartford, Connecticut, Columbus, Ohio, Wilmington, Delaware,
13 and, of course, this one is for the Salt Lake City station.
14 Ma'am, if you were so busy during this period of time with the
15 full-power station in Odessa and, as you said, planning for
16 the Portland station, why did NMTV file applications for
17 Hartford, Columbus, Wilmington and Salt Lake City?

18 A Well, I knew that the window was only going to open
19 once a year and this was a once-a-year opportunity. And the
20 responsibilities for filing in the station -- Basically, my
21 responsibility would be to make the decisions as to where we
22 were going to go and I would delegate the research to a
23 consulting firm. And at that time, Mr. Sebastian was a
24 volunteer, so he did the, the site procurement. And so my
25 responsibility was mainly to oversee these projects. And so

1 that's why we went ahead, and we knew that this opportunity
2 was a once-in-a-lifetime. And so you just do what you have to
3 do.

4 Q What was the basis for determining that NMTV should
5 file for Hartford, Columbus, Wilmington and Salt Lake City?

6 A The project would consist of going back to the -- to
7 square one. We'd go back to the top markets and we'd go
8 through the process again to see what the largest markets were
9 that were available, and I would work in conjunction with our
10 consultant, engineering consultant, Smith and Powstenko, and
11 see what was there. And we'd go back and see if some channel
12 got turned in again. So that's why we'd start with square
13 one, and then we'd find out if the sites were available. And
14 that's how we came up with a list of the most viable markets.

15 Q Were there any NMTV board meetings approving the
16 filing of these applications?

17 A There was usually a discussion. I don't remember
18 specifically having a, a board meeting regarding this, because
19 my mandate long ago was to file for stations. And any time
20 there was a window I didn't feel like I had to go and get
21 board approval. I felt this was what the board -- this was
22 what NMTV was all about, to go after these stations in the
23 largest markets. And when you've got a deadline, you just go
24 with it, and that's what I did.

25 Q So this is not something that you would have brought

1 to Mr. Espinoza's attention?

2 A I would ask him -- You know, I would ask him if
3 there was something he was thinking about, but I knew at this
4 time there were so few frequencies available that we were
5 going to have to get whatever we could get. And I would
6 inform him as to what we were able to file for.

7 Q Let's turn to Bureau Exhibit Number 202. And that's
8 a two-page office memo from George Sebastian to Paul Crouch.
9 You're cc'd on page 2. Do you recall receiving the cc of this
10 office memo at about the time it was prepared?

11 A I don't have a specific memory of it, but I'm sure
12 that I read it.

13 Q Why is NMTV, if you know, lumped together with All-
14 American Television and Trinity Broadcasting of Arizona and
15 Inspiration Television of Southern Oregon?

16 A This was in the way of information so that if any of
17 our other affiliates had filed for a market, we didn't want to
18 file in the same markets as they did. So this, this is the
19 way the communication between the other stations -- the other
20 companies that wanted to affiliate with Trinity, and this was
21 so we didn't have overlapping, so that one wouldn't file for
22 the same market another one filed for.

23 Q Mrs. Duff, isn't it a fact that at this time there
24 was a limit on the number of applications that any one entity
25 could file during a window?

1 A Yes.

2 Q Now, as of the date of this memo, June 29, 1988,
3 wasn't George Sebastian still the president of Inspiration
4 Television of Southern Oregon?

5 A Yes.

6 Q And this is an interoffice memo directed to you --
7 I'm sorry, directed to Paul Crouch. This is a TBN memo, isn't
8 it?

9 A Yes. Well, actually, Mr. Sebastian was a volunteer.
10 He wasn't -- I mean, he just used whatever stationery was
11 there in the office.

12 Q On page 2, Mr. Sebastian identifies himself as low-
13 power director. That's the position he held at TBN, wasn't
14 it?

15 A He was a volunteer. Whatever title he gave himself,
16 you know, it wasn't a problem with me because he wasn't an
17 employee. He was, he was never an employee.

18 MR. SCHONMAN: Your Honor, can I go off the record
19 for a moment?

20 JUDGE CHACHKIN: Yes.

21 MR. SCHONMAN: I have to look at my notes.

22 (Off the record.)

23 JUDGE CHACHKIN: I just want to ask you one thing,
24 Ms. Duff.

25 MRS. DUFF: Yes, sir.

1 JUDGE CHACHKIN: This, this letter was sent to you
2 and to Ben Miller.

3 MRS. DUFF: Yes, sir.

4 JUDGE CHACHKIN: And Mr. Sebastian is holding
5 himself as low-power director and you had no problem with
6 that, him holding himself as low-power director, apparently.
7 You didn't in any way tell him not to, did you?

8 MRS. DUFF: No, sir. I, I -- This man was -- He
9 needed a little, how should I say it, to build his ego a
10 little bit. I didn't think that there was any problem with
11 that because we weren't paying him and he was doing all this
12 work free gratis. So I wasn't going to cut him down by
13 telling him no, you can't have this title. It didn't really
14 mean anything and he was doing a lot of work for us. I was
15 just grateful for what he was doing 'cause it would cost me an
16 awful lot of money to, you know, to pay a salaried person to
17 do the kind of work that he was doing.

18 JUDGE CHACHKIN: He also indicates in the letter
19 that he was talking to the attorneys. Is that a fact? Did
20 he, did he talk to attorneys on behalf of TBN?

21 MRS. DUFF: No, sir, I don't -- Well, if he did talk
22 to them, I wouldn't have cut him down for it because we were
23 on retainer, and there might have been some times when he had
24 a question or two. But he did so much for us, I, I didn't
25 want to insult the man by telling him he couldn't consult with

1 our attorneys because I felt that it wasn't anything that
2 would get out of line because I was on top of it. I saw the
3 attorney bills, so I knew what it was that it was costing us.
4 So I didn't worry about it.

5 JUDGE CHACHKIN: Well, whether he was a volunteer or
6 not, he was doing important work for TBN, was he not?

7 MRS. DUFF: Yes, he was.

8 JUDGE CHACHKIN: Go ahead, Mr. Schonman.

9 BY MR. SCHONMAN:

10 Q Mrs. Duff, are you aware of any affiliation
11 agreements or affiliation understandings between TBN and
12 George Sebastian's Inspiration Television of Southern Oregon?

13 A At one time, he, he owned a station in Klamath
14 Falls, Oregon, and I believe -- Yes, he was -- their station
15 was affiliated with us in the very beginning.

16 Q Was there any special arrangement that he had with
17 TBN?

18 A Well, not a special arrangement, not any more than
19 any other affiliate. He got 80 percent of the zip code
20 remuneration that came in from the community, just like all
21 the other low-power affiliates that we had.

22 Q Mrs. Duff, let's move on to Bureau Exhibit
23 Number 204. That's an invoice from May and Dunne. This one
24 is dated July 11, 1988. It's directed again to Trinity
25 Broadcasting Network and includes charges for services

1 rendered to NMTV. Do you know why NMTV is included here?

2 A I don't have anything additional to add, any
3 additional to add to that.

4 Q Let's move to Bureau Exhibit Number 205. That's a
5 letter from May and Dunne dated July 15, 1988, to the
6 secretary of the Commission and it transmits ownership reports
7 for several stations. Mrs. Duff, who asked Colby May to
8 prepare this cover letter and the associated documents?

9 A I'm not sure anybody asked him to do it. It may
10 have been something he just did. I don't recall asking him to
11 send it. I may have, but I just don't remember.

12 Q Bureau Exhibit Number 207, that's a, an invoice from
13 May and Dunne dated August 5, 1988, directed to Trinity
14 Broadcasting Network and it includes charges for services
15 rendered to NMTV. Do you know why NMTV is included in this
16 invoice?

17 A I don't have anything additional to add to that.

18 Q Let's turn to Bureau Exhibit Number 208. Can you
19 explain what this is?

20 A This is a purchase order or check requisition
21 referencing Fresno, California. This was the purchase order
22 for the equipment for NMTV's first low-power station in
23 Fresno.

24 Q In what amount?

25 A \$58,734.

1 Q Now, this is a TBN form, correct?

2 A Yes.

3 Q Who requisitioned this form, Mrs. Duff?

4 A It was requisitioned by George Sebastian and I
5 signed it, as well as Mr. Crouch --

6 Q How did Mr. Sebastian come to requisition --

7 A I think he was getting a little bit -- It wasn't a
8 thing that -- That's why there are three signatures on, on the
9 authorization. That wasn't -- I don't believe this was -- I
10 don't remember having given him the authority to requisition.
11 However, we processed it because we wanted to get this, this
12 purchase order through and get the pill paid.

13 Q How did he come to requisition this?

14 A I, I don't understand your, your question. How did
15 he come to do it? I don, I don't know why he took it upon
16 himself to do the, the actual requisitioning.

17 Q You said that there were three authorized initials
18 there, and I think you only identified two. Who were the
19 three there?

20 A Ben Miller, myself, and Paul Crouch.

21 Q Can you turn to page 2 of that same exhibit?
22 There's a notation at the bottom of this page that says "Per
23 Ben, hold check until tech problems are corrected." Do you
24 recognize whose handwriting or initial that is below that
25 message?

1 A That would be his purchasing secretary?

2 Q Who is that?

3 A Pat Saint John Clerke.

4 JUDGE CHACHKIN: Do you know why this equipment is
5 being shipped to Trinity Broadcast Network at Tustin,
6 California, when it's an item for Fresno, California,
7 National -- NMTV item?

8 MRS. DUFF: It was probably for billing purposes.

9 JUDGE CHACHKIN: This says it's being shipped, the
10 item is being shipped, it says. Why is it being shipped to a
11 TBN station?

12 MRS. DUFF: It wasn't shipped to TBN because that's
13 not where the station was to be billed. That, that's, that's
14 not correct.

15 JUDGE CHACHKIN: Go ahead.

16 MR. SCHONMAN: Thank you, Your Honor.

17 BY MR. SCHONMAN:

18 Q Mrs. Duff, let's turn to Bureau Exhibit Number 210.
19 That's a special meeting of Trinity Christian Center of Santa
20 Anna. The meeting was held on August 11, 1988. And I see
21 from the second paragraph that you attended this meeting as
22 well.

23 A Yes.

24 Q Why did you attend this meeting?

25 A Well, the only time I attended a meeting is if, if

1 Mr. Crouch specifically asked me. And -- If these meetings
2 had been something that Mr. Crouch specifically wanted me to,
3 to assist him, I would be at the meeting at his request. But
4 it was not my practice to attend the Trinity board meetings
5 after I resigned from the Board.

6 Q Mr. Crouch asked you to attend lots of these
7 meetings, didn't he?

8 A As his assistant.

9 Q Let's turn to Bureau Exhibit Number 211. That's an
10 audit report for December 31, 1987. And on page 2, you'll
11 notice that it identifies Trinity Broadcasting Network as the
12 parent company. Now, let's look at page 9 of this, this
13 document. You'll see on page 9 that there's a column for
14 National Minority TV. You see that?

15 A Yes.

16 Q Do you know why on December 31, 1987, NMTV was
17 included in this combined financial document?

18 A No, I do not.

19 Q Turn to page 5, Mrs. Duff.

20 JUDGE CHACHKIN: The same exhibit?

21 MR. SCHONMAN: Yes.

22 BY MR. SCHONMAN:

23 Q Now, although the financial report was prepared for
24 December 31, 1987, the actual date that it was concluded was
25 August 15, 1988. And I'll ask you the same question, as of

1 August 15, 1988, when the auditors finished this report, why
2 was NMTV included in this combined financial report?

3 A I, I'm sorry, I don't know.

4 Q Did you examine this report at the time it was
5 prepared?

6 A I don't know if I did or not.

7 Q Would it have been your practice to review this
8 financial report?

9 A If I had an opportunity at the board meeting, I, I
10 would have.

11 Q If it was your practice, if I understand your
12 testimony, that it was your practice to review all previous
13 financial reports.

14 A Right.

15 Q Is there any difference about this one?

16 A No, but I, I don't have a recollection of it.

17 Q Now, on page 9 of this financial report, under the
18 column for National Minority TV on the right-hand side, you
19 see that there's a total fund balance in the negative amount
20 of \$480,574. Do you recall any discussion among any members
21 of NMTV's board about that negative fund balance?

22 A No, sir, I do not.

23 Q Do you recall any red flags going up about a
24 negative fund balance in the amount in excess of \$480,000?

25 A No, sir, I don't.

1 Q Do you know why?

2 A Do I know why? I don't understand the question.

3 Q Why there was -- Why no one noticed this?

4 A The only thing that I could say is my focus was
5 always on what was coming in, you know, as far as donations.
6 At this point, there was a little trickle of money coming in
7 from National Minority, and I think that's probably the only
8 thing that I did was to go across the top.

9 Q Was Reverend Espinoza at this time still the CFO of
10 NMTV?

11 A He was a director. I'm not sure what position he
12 held at, at this particular year.

13 Q Do you know who at this time was the treasurer or
14 CFO of NMTV?

15 A Not without actually looking at the record.

16 MR. SCHONMAN: Your Honor, what we're doing now is
17 going back to the board minutes, trying to determine who held
18 the position of secretary.

19 MR. COHEN: What -- For what, what period of time?
20 Maybe I can help.

21 MR. SCHONMAN: That would be the 1988 annual meeting
22 of NMTV.

23 MR. COHEN: Eighty-seven you want to know?

24 MR. SCHONMAN: Eighty-eight.

25 MR. COHEN: Eighty-eight.